



September 21, 2020

CPUC Energy Division
Attn: Tariff Unit and Edward Randolph, Director
505 Van Ness Avenue
San Francisco, CA 94102

By email: EDTariffUnit@cpuc.ca.gov

Re: CalCCA and DACC Response to the Joint IOU Advice Letters in response to Decision 20-03-019

Dear Tariff Unit and Mr. Randolph:

Pursuant to General Order 96-B, the California Community Choice Association (CalCCA)¹ and the Direct Access Customer Coalition (DACC)² submit this joint response to Pacific Gas & Electric Company's Advice Letter 4302-G / 5932-E, Southern California Edison's Advice Letter 4280-E and San Diego Gas and Electric's Advice Letter 3600-E ("Advice Letters").

Pacific Gas & Electric Company (PG&E), Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) (collectively, "Joint IOUs") filed the Advice Letters in response to Decision ("D") 20-03-019, Ordering Paragraph ("OP") 2:

Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall collaborate to submit a joint proposal for bill and tariff changes to show a power charge indifference adjustment line item in their tariffs and bill

¹ CalCCA was formed in 2016 as a trade organization to facilitate joint participation in certain regulatory and legislative matters in which members share common interests. CalCCA's voting membership includes CCAs serving load and others in the process of implementing new service, including: Apple Valley Choice Energy, Baldwin Park Resident Owned Utility District, Central Coast Community Energy, CleanPowerSF, Clean Energy Alliance, Clean Power Alliance, Desert Community Energy, East Bay Community Energy, Lancaster Choice Energy, MCE, Peninsula Clean Energy, Pioneer Community Energy, Pico Rivera Innovative Municipal Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Silicon Valley Clean Energy, Solana Energy Alliance, Sonoma Clean Power, Valley Clean Energy, and Western Community Energy.

² DACC is a regulatory advocacy group comprised of educational, governmental, commercial and industrial customers that utilize direct access for all or a portion of their electrical energy requirements.



summary tables on all customer bills. Each utility shall submit a Tier 3 Advice Letter by August 31, 2020, to implement the joint proposal by the last business day of 2021. Energy Division is authorized to hold workshops after the filing of advice letters. The proposals must make a showing that the proposed bill and tariff changes are complete and reasonable

The Joint IOUs' proposals contain essentially two changes: (1) refining the definition of PCIA to clarify that all customers pay the PCIA, and (2) adding a PCIA line item to bundled customer bills. These changes are an essential first step towards true comparability for bundled and departed load customer bills. CalCCA urges the Commission to rapidly approve the proposals in the Advice Letters. As described in the Advice Letters, the proposals track those made by CalCCA as part of the Working Group 1 process in Rulemaking (R.)17-06-026, and by AReM/DACC in an early phase of R.17-06-026, and which the Commission endorsed in principle in D.18-10-019.³

CalCCA read with concern the language in PG&E and SCE's advice letters foreshadowing a possible delay in implementing the changes due to planned upgrades and changes to their billing system.⁴ Given the relative simplicity of the changes here, the fact that these charges already exist on unbundled customer bills and the ample notice to the IOUs that they would need to make such changes (arguably since at least D.18-10-019⁵ when the Commission agreed that bill and tariff changes were necessary), we expect the IOUs to meet the Commission's deadline here. Rapid Commission approval of the Advice Letters will doubtless facilitate timely compliance.

The proposals here are a necessary first step towards comparable bundled and unbundled bills. In the language of OP 2, these proposals are "reasonable," but not yet "complete." Even with the changes proposed here, bills remain a confusing customer experience for bundled and unbundled customers alike. More work is needed on both the bills and tariffs to enable customers to make sense of their choices. Accordingly, once these advice letters are approved, the Energy Division should hold workshops as authorized in D.20-03-019 OP 2 to develop a set of further bill and tariff changes during 2021. Again, the purpose of the workshop should focus on the additional changes needed to make bundled customer's bills and tariffs truly comparable to unbundled customer bills. And because certain changes to tariffs require changes to rates, this work should be coordinated with each IOU's GRC Phase 2 Proceeding.⁶

³ "In D.18-10-019, the Commission has found merit in the tariff revision and bill presentation proposals put forth by AReM/DACC and CalCCA." D.20-03-019, at 21.

⁴ PG&E Advice Letter 4302-G / 5932-E at 9; SCE Advice Letter 4280-E at 7.

⁵ D.18-10-018 at 119.

⁶ PG&E Application 19-11-019; SCE Application 19-08-013; SDG&E Application 19-03-002.



We thank the Commission for its consideration of this response.

Respectfully submitted,

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Service List R.17-06-026